April 21, 2022

Mr. Ray Anders
Kona Drone Service LLC
75-5503 Mamalahoa Hwy
Holualoa, HI 96725

Dear Mr. Anders:

This letter is to inform you that the following information is missing from your petition dated January 20, 2022 on behalf of Kona Drone Services LLC (Docket No. FAA-2021-0921).

This information is necessary for the Federal Aviation Administration (FAA) to process your petition. Pursuant to 14 CFR part 11 you are requesting an amendment to your existing exemption to operate closer than 500 feet to vehicles without obtaining permission from the person responsible for the vehicle. 14 CFR part 11 requires that you provide the extent of relief you seek and the reason you seek the relief; reasons why your request, if granted, would be as safe as what your current exemption authorizes; and, why granting that request is in the public interest (see 14 CFR part 11, §11.81).

Your petition seeks relief from your current exemption condition and limitation 27(c) requiring Kona Drone Services LLC to obtain permission from people responsible for vehicles within 500 feet of your agricultural application operation is unrealistic. You provided a Safety Management Systems (SRS) and Safety Risk Management (SRM) document. None of the information you provided explains the extent of relief you are seeking. Your SRM mentions Probabilistic Risk Assessment but does not explain what data you will base the assessment on or how you will apply the findings. You also explain the Monte Carlo Dispersion Model, but do not state how Kona Drone Services LLC will use the system. Please explain what you are proposing to do and how that will be as safe as gaining permission from the people responsible for the vehicles. Also, please explain how not gaining permission from those people is in the public interest, and provides an equivalent level of safety to the condition and limitation.

Additionally the SRM you provided limits the operations to the contiguous United States. If Kona Drone Services LLC is based in Hawaii, as your address indicates, it appears that

you did not create the SRM yourself, but copied it and submitted it to the FAA without reading and understanding its contents. This is also evident in the description of the enhancements to vision which state "binoculars, telephotos lens, night vision goggles, and field glasses are allowed as augmentation devices."

Please provide a comprehensive operational risk and safety manual containing a detailed risk analysis specific to your operation. Petitioners who have been issued similar grants of exemption (see Exemption No. 18009) have provided a comprehensive operational risk and safety manual. Your operational risk and safety manual should identify risks specific to your operation, provide procedures to mitigate those risks, and determine whether the residual risk level is acceptable. Guidance can be found in FAA Order 8040.6.

What You Need To Do:

If you want the FAA to process your request any further, you must send the information described above by May 9, 2022 before 11:59PM ET. We will consider your petition request open during this period.

Please submit the additional information (non-proprietary) as a comment to your docket at www.regulations.gov, and save the tracking number generated after submission. Proprietary information may be submitted electronically to Jake Troutman, Matthew Porter, David Reaves, and Jay Skaggs at jake.troutman@faa.gov, matthew.j.porter@faa.gov, david.reaves@faa.gov, and jay.d.skaggs@faa.gov respectively.

If the FAA does not receive the requested information from you by the date indicated above, the FAA will take no further action on this petition and close the matter without notifying you further. If you have any questions or require additional time, you may call (717)712-1035.

Sincerely,

Jay D. Skaggs
FAA Safety Standards, AFS-830
General Aviation and Commercial Division